

Permit Alteration Source Analysis & Technical Review

Company	Building Materials Corporation of America	Permit Number	7711A
City	Dallas	Project Number	150795
County	Dallas	Account Number	DB-0378-S
Project Type	Revision	Regulated Entity Number	RN100788959
Project Reviewer	Mr. Javier Galván, P.E.	Customer Reference	CN602717464

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Site Name **Asphalt Roofing Production Facility**

Project Overview

Building Materials Corporation of America dba GAF Materials Corporation (GAF) requests a permit alteration to NSR Permit No. 7711A. GAF wishes to increase the stack heights for the Line 1 and Line 3 Cooling Sections. GAF submitted an air quality permit amendment application on December 18, 2008 to correct alleged violations resolved pursuant to an Agreed Order and other self-disclosed violations. The amendment application (project no. 143272) to authorize emission rate increases of designated air pollutants of certain existing facilities is currently being reviewed.

This permit alteration request does not result in a change in the method of control of emissions, a change in the character of emissions, or an increase in the emission rate of any air contaminant. GAF understands that this permit alteration request does not constitute approval of the requested increases in emissions associated with the pending NSR permit amendment application. No changes to the MAERT of the NSR permit have occurred as a result of this permit alteration request. A limitation/requirement for the new stack heights has been added to the NSR permit special conditions.

Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	4		<i>(none requested)</i>

Review Summary

As part of the permit amendment application for the NSR permit submitted on December 18, 2008, GAF subsequently submitted air dispersion modeling on May 5, 2009 in response to a request by the permit engineer on April 29, 2009. This modeling exercise was based not only on the stack heights proposed in this permit alteration request, but also on the proposed permit allowable emission rates represented in the permit amendment application, i.e. the new/increased emission rates for those facilities undergoing modifications. The modeling results encompassing these physical parameters are shown below in the "Modeling Results and Air Quality Analysis" section. These results have already been reviewed by the permit engineer regarding averaging periods and background concentrations as well as other associated permit review/health impacts review criteria. The new stack heights are 73 feet, measured from ground level, for the Line 3 Cooling Section (EPN COOL3) and 64 feet, measured from ground level, for the Line 1 Cooling Section (EPN COOL1).

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	No - not for this project	Type of Modeling:	N/A
Will GLC of any air contaminant cause violation of NAAQS?	No		
Is this a sensitive location with respect to nuisance?	Yes: Nuisance/Odor Potential - High; Hazard Potential - High		
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?	Yes - Thomas Edison, approx. 600 feet		

Summary of Modeling Results and Air Quality Analysis

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Standard:	Averaging Period:	GLC _{max} :	SIL:	Background Conc.:	Total Conc.:	NAAQS:	TCEQ
PM ₁₀	24-hour	68	5	56	124	150	
	Annual	18	1	30	48	50	
NO _x	Annual	14	1	30	44	100	
CO	1-hour	622	2,000				
	8-hour	335	500				
SO ₂	1-hour	676			676		1,021
	3-hour	532	25	24	556	1,300	
	24-hour	329	5	13	342	365	
	Annual	39	1	3	42	80	

	Averaging Period:	GLC _{max} :	TCEQ ESL:
Asphalt vapor	1-hour	336	350
	Annual	25	35

Total concentrations were modeled.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Latha Kambham, Ph.D., Trinity Consultants
Contacted Via:	e-mail
Date of contact:	9.23.09
Other permit(s) or permits by rule affected by this action:	No
List permit and/or PBR number(s) and actions required or taken:	N/A

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
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